

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT BECKLEY**

**MATTHEW GIBSON,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO.: 5:21-cv-00181  
HONORABLE FRANK W. VOLK**

**LOUISE E. GOLDSTON, individually,  
COUNTY COMISSION OF RALEIGH  
COUNTY, a political subdivision,  
JEFF MCPEAKE, individually,  
BRIAN WHITE, individually,  
BOBBY STUMP, individually,  
KYLE LUSK, individually,**

**Defendants.**

**MOTION FOR DISCLOSURE OF JURY QUESTIONNAIRES**

NOW COMES J. Victor Flanagan, Kevin J. Robinson, and the law firm of Pullin, Fowler, Flanagan, Brown & Poe, PLLC., as counsel for Defendants, Raleigh County Commission, Jeff McPeake, Brian White and Bobby Stump, and hereby move this Court to direct the disclosure of the jury questionnaires to counsel for the Defendants. In support of their Motion, Defendants respectfully submit that the disclosure of the jury questionnaires is necessary in order to prepare for trial.

**COUNTY COMMISSION OF RALEIGH  
COUNTY, JEFF McPEAKE, BRIAN  
WHITE AND BOBBY STUMP**

**By Counsel,**

/s/ Kevin J. Robinson

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Kevin J. Robinson, WV State Bar No. 10181

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KYLE LUSK, individually,

Defendants.

**CERTIFICATE OF SERVICE**

The undersigned, counsel of record for Defendants, does hereby certify on this 7th day of July, 2022, that a true copy of the foregoing "**MOTION FOR DISCLOSURE OF JURY QUESTIONNAIRES**" was served upon opposing counsel through the Court's CM/ECF filing System as follows:

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/s/ Kevin J. Robinson

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